

Benjamin C. Durham, Esq. (7684)  
BENJAMIN DURHAM LAW FIRM  
601 S. 10<sup>th</sup> St.  
Las Vegas, Nevada 89101  
(702) 631-6111  
*Attorney for Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
FERNANDO LARA-MARTINEZ,  
  
Defendant.

CASE NO: 2:14-CR-202

**UNOPPOSED MOTION FOR PRE-PLEA  
PRESENTENCE INVESTIGATION REPORT &  
PROPOSED ORDER**

COMES NOW, Benjamin C. Durham, and hereby moves the court to order a pre-plea presentence investigation report. The defendant may have a prior conviction that would impact his sentencing exposure and plea negotiations, and that could result in a sentencing disparity of several years in prison. The presentence report will promote judicial economy and assist in the resolution of this case. Undersigned counsel respectfully requests an order that the Probation Department conduct a pre-plea presentence investigation report. Counsel has spoken with Assistant United States Attorney Amber Craig, who does not oppose this request.

DATED this 19th day of August, 2015.

/s/ Benjamin Durham  
BENJAMIN C. DURHAM ESQ.  
Nevada Bar No. 7684  
601 S. 10<sup>th</sup> St.  
Las Vegas, Nevada 89101  
(702) 631-6111  
*Attorney for Defendant*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

CASE NO: 2:14-CR-202

Plaintiff,

**ORDER**

v.

FERNANDO LARA-MARTINEZ,

Defendant.

IT IS HEREBY ORDERED that the Probation Department will prepare a pre-plea presentence investigation report for Defendant Fernando Lara-Martinez.

DATED this 21st day of August, 2015.

  
DISTRICT COURT JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that I served the foregoing MOTION on all parties via electronic filing on the 20<sup>th</sup> day of August, 2015.

/s/ Cristina Flores

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An employee of Benjamin Durham Law Firm